

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Lifeline and Link Up Reform and
Modernization

WC Docket No. 11-42

**STATUS REPORT AND REQUEST FOR EXTENSION OF TIME
OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION
AND THE PEOPLE OF THE STATE OF CALIFORNIA TO COMPLY
WITH 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) AND 54.410(e)**

The California Public Utilities Commission and the People of the State of California (CPUC or California) hereby submit this filing to: 1) provide a status report on CPUC's compliance with 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) and 54.410(e); and 2) request an extension of time to comply with 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) and 54.410(e).

On August 30, 2013, the Federal Communications Commission (Commission) issued an order (August 2013 Order) granting more time for certain state commissions to comply with 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) and 54.410(e). These sections require state LifeLine administrators to provide a copy of the subscriber certification forms to Eligible Telecommunications Carriers (ETCs) and for ETCs to obtain the forms prior to seeking reimbursement from the federal universal service fund (Fund). On May 6, 2013, United States Telecom Association (US Telecom), on behalf of

certain states including California¹, petitioned the Commission for additional time, beyond the June 1, 2013 compliance due date, to comply with these rules. US Telecom explained that the states needed more time to modify their Lifeline processes to come into compliance.

In the August 2013 Order, the Commission granted US Telecom's petition and provided California and other affected states additional time -- until February 1, 2014 -- to implement the certification form requirement. The Commission also ordered these states to provide a status report by November 1, 2013 on the progress being made to come into compliance. The Order held that states may file for further relief if additional time is needed beyond the February 1, 2014 compliance deadline.

A. Status Report on CPUC's Compliance with 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) and 54.410(e)

CPUC hereby provides the Commission with a status report on the progress that the CPUC has made to bring its LifeLine process into compliance with 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) and 54.410(e). CPUC has worked with Xerox State and Local Solutions, Inc. (Xerox), its Lifeline administrator, to find a solution that will meet the Commission's certification form requirement. Xerox, however, is unable to begin the work until our third-party administrator LifeLine contract is amended and approved. The work to provide certification forms to carriers is outside of the scope of the current LifeLine contract with Xerox and CPUC needs approval from

¹ Other states include Colorado, Florida, Idaho, Nebraska, Oregon, Utah and Vermont.

the State of California's Department of General Services (DGS) to amend the contract. The contract amendment has been submitted and we are waiting for a response.

As soon as DGS approves the contract amendment, Xerox will begin its work and anticipates that it will take approximately five months to implement the new certification form exchange process. In this new process, certification forms will be coded with a 2D barcode and the supporting documents, such as tax returns and paystubs, will not be coded with a 2D barcode. The documents will then go through a scanning process whereby the scanner will produce a PDF document of the barcoded pages only, namely the certification forms. The scanner will be able to differentiate between the barcoded and the non-barcoded pages and this will allow Xerox to provide a copy of the certification forms to the carriers without the supporting documents. The new barcoded certification forms will be made available to the carriers for download from a secured website on a weekly basis. Xerox will also ensure that all legacy forms (without a 2D barcode) are out of circulation during the implementation process.

B. Request for Extension of Time to Comply with 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) and 54.410(e).

The August 2013 Order requires California to come into compliance with 47 C.F.R. §§ 54.407(d), 54.410(b)(2)(ii), 54.410(c)(2)(ii) and 54.410(e) by February 1, 2014. We request an additional five months -- until July 1, 2014 -- to comply with these rules. Xerox is ready to implement a new certification form exchange process, but is unable to begin the process until the CPUC obtains an approval of its contract amendment from DGS. We hope to receive an approval in the near future and begin the

work. With an additional five months, CPUC anticipates that its LifeLine process will be in full compliance with the Commission's certification form requirement.

Respectfully submitted,

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